

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

T.E., et. al.,

Plaintiffs,

v.

PINE BUSH CENTRAL SCHOOL
DISTRICT, et. al.,

Defendants.

12-CV-2303 (KMK)(PED)

PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS

EMERY CELLI BRINCKERHOFF & ABADY LLP
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1. What town do you live in?
2. Have you or anyone close to you ever been accused of discrimination, harassment, bullying, or abuse?
 - a. Who was involved?
 - b. How do you feel about what happened?
3. Where do you get your news?
4. Do you have any concerns about deciding compensation for emotional distress and psychological pain and suffering?
5. Do you believe that people bring too many lawsuits?
6. What is your view about whether there should be a cap or limit on damages that can be recovered in a lawsuit?
7. Has anyone ever filed a claim or a lawsuit against you or a member of your family or a close friend?
 - a. What type of claim or lawsuit?
 - b. How was it concluded – dismissed, settled, trial?
 - c. How did you feel about that lawsuit?
8. Do you have any reservations about applying the lower “more likely than not” standard in this civil case, rather than the higher criminal burden of “beyond a reasonable doubt”?
9. What are your primary activities or hobbies outside of work?
 - a. Do you make charitable donations or engage in volunteer work?
 - b. Do you participate in any social, political, or religious organizations?
10. What are your thoughts about whether the Holocaust happened or whether it was exaggerated?

11. Do you have school-age children?

- a. If so, do they attend public or private school?
- b. Are you involved in the school?
 - i. If so, how?

12. Do you think concerns about bullying in school have become exaggerated?

Dated: May 29, 2015
New York, New York

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